## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

OLLIE GREENE, Individually as the	§	
Surviving parent of WYNDELL GREENE,	§	
SR., WILLIAM GREENE, as the	§	
Administrator of the Estate of WYNDELL	§	
GREENE, SR., and MARILYN BURDETTE	§	
HARDEMAN, Individually and as the	§	CAUSE NUMBER 3:11-cv-0207-N
Surviving parent of LAKEYSHA GREENE,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	JURY TRIAL DEMANDED
	§	
TOYOTA MOTOR CORPORATION,	§	
TOYOTA MOTOR ENGINEERING &	§	
MANUFACTURING NORTH AMERICA,	§	
INC., TOYOTA MOTOR SALES USA, INC.,	§	
VOLVO GROUP NORTH AMERICA, IND.,	§	
VOLVO TRUCKS NORTH AMERICA, A	§	
A DIVISION OF VOLVO GROUP	§	
NORTH AMERICA, LLC., STRICK	§	
TRAILERS, LLC, JOHN FAYARD	§	
MOVING & WAREHOUSE, LLC and	§	
DOLPHIN LINE, INC.	§	
	§	
Defendants.	§	
	§	
	§	

## STRICK'S SUPPLEMENTAL OBJECTIONS TO PLAINTIFFS' SECOND AMENDED EXHIBIT LIST

Defendant Strick Trailer, LLC. ("Strick"), having now received Plaintiffs' exhibits, supplements its objections to exhibits on Plaintiffs' Second Amended Exhibit, as set forth below. Having had an opportunity to review exhibits not adequately described on Plaintiff's Second Amended Exhibit List, Strick is also able to withdraw some of its objections, as set forth below.

PLF. NO.	DESCRIPTION	Strick's Objections
1.	Photo of Lakeysha Greene laying in the	On grounds stated in Strick Motion in
1.	roadway	Limine Re Gruesome Evidence [DOC. 627]
	13.00.00	and Toyota's Motion In Limine No. 6
		relating to Evidence Regarding any Alleged
		Damages Concerning or Relating to
		Lakeysha or Wyndell Greene, and joined
		by all Defendants (DOC 672)
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2.	Photo of Toyota SUV burning at accident site	Fed. R. Evid. 401, 402, 403 and also if
		remains are showing on grounds stated in
		Strick's Motion in Limine Re Gruesome
		Evidence [DOC. 627] and Toyota's Motion In Limine No. 6 relating to Evidence
		Regarding any Alleged Damages
		Concerning or Relating to Lakeysha or
		Wyndell Greene, and joined by all
		Defendants (DOC 672) and Toyota's
		Motion to Exclude the Children submitted
		on behalf of, and joined by, all Defendants.
		[Doc. 672]
3.	Kaufman County Records Affidavit of 9-1-1	Hearsay. Fed. R. Evid. 802. Unduly
3.	calls	Prejudicial. Fed. R. Evid.403. Also object
	cuis	to portions of call transcripts referring to
		death of children on grounds stated in
		Toyota's Motion to Exclude the Children
		submitted on behalf of, and joined by, all
		Defendants. [Doc. 672] and Toyota's
		Motion In Limine No. 6 relating to
		Evidence Regarding any Alleged Damages
		Concerning or Relating to Lakeysha or

		Wyndell Greene, and joined by all Defendants (DOC 672).
4.	Photo of Greene child charred remains	On grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
5.	Photo2 of Greene child charred remains	On grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
6.	Photo of wreckage and blood on roadway	On grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
7.	Photo of charred remains being removed from Toyota 4Runner	On grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]

8.	Photo of rear of Toyota 4Runner at accident site	OBJECTION WITHDRAWN
9.	Photo of side of Toyota 4Runner at accident site	OBJECTION WITHDRAWN
10.	Photo of rear of Dolphin-Strick trailer at accident site	OBJECTION WITHDRAWN
11.	Photo of ICC Rear Impact Guard laying in roadway	OBJECTION WITHDRAWN
12.	Photo2 of ICC Rear Impact Guard laying in roadway	OBJECTION WITHDRAWN

13.	Intentionally Omitted	
14.	Photo of mud-flap on Dolphin Trailer at accident site	OBJECTION WITHDRAWN
15.	Close-up of photo2 of mud-flap on Dolphin Trailer at accident site	OBJECTION WITHDRAWN
16.	Photo of the Volvo tractor's front grill at accident site	
17.	Photo of front of Volvo truck at accident site	
18.	Intentionally Omitted	
19.	Intentionally Omitted	
20.	Intentionally Omitted	
21.	Invoice for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.	
22.	Quotation for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.	
23.	Photo of rear of Strick Trailer after repair by Gulf City Body and Trailer Works, Inc.	
24.	Intentionally Omitted	
25.	Intentionally Omitted	
26.	Accident Report dated June 1, 2010, from Daniel Sprinkle of May 28, 2010, accident	
27.	Photos of rear of Strick trailer after accident - taken by John Fayard Moving	
28.	Fayard's Net Worth [CONFIDENTIAL]	Fed. R. Evid. 401, 402, 403.
29.	April 6, 2010 Dolphin Repair Order	

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30.	List of Trailers owned by Dolphin	
31.	Exemplar of Dolphin Broker Carrier Agreement, such as the one with Fayard Moving and Warehouse	
32.	Delivery receipt from RC Trailers for delivery of Strick Trailers to Dolphin	
33.	Financial statements of Dolphin Line Inc. [CONFIDENTIAL]	Fed. R. Evid. 401, 402, 403.
34.	July 10, 2007 Dolphin Repair Order	
35.	February 29, 2008 Dolphin Repair Order	
36.	July 2, 2008 Dolphin Repair Order	
37.	April 6, 2010 Dolphin Repair Order	
38.	Intentionally Omitted	
39.	Email from Todd Parks with deposition subjects for Strick designees and notification of production of exemplar trailer	Fed. R. Evid. 403, irrelevant communication of counsel involving discovery issues.
40.	Strick Invoice dated February 10, 2003 with RC Trailers	
41.	Strick Invoice with RC Trailers, signed by all	
42.	Strick Sales Order Specifications for RC Trailers Order	

43.	Press Release from Insurance Institute for Highway Safety – Underride guards on big rigs fail in crashes; Institute petitions government for new standard	Hearsay. Fed. R. Evid. 802. Document is post-accident (dated 3/14/13) not relevant to notice. No foundation. Contains irrelevant unduly prejudicial data re all heavy truck deaths. (See Strick Motion in Limine Re Heavy Truck Death/Injury Rates- DOC. 624) and to inapplicable Canadian standards not in effect at the time of manufacture (See Strick Motion in Limine Re Inapplicable Standards (DOC. 629). Contains significant opinion throughout article about Strick is unable to cross examine a document. Fed. R. Evid. 403. U.S. Const. Amend. 5 and 14; Texas Const. Art. 1 §18.
44.	Letter to NHTSA from Insurance Institute for Highway Safety re: petitioning the government for new standard for underride guards	Hearsay. Fed. R. Evid. 802. Document is post-accident (dated 3/14/13) not relevant to notice. No foundation. Contains irrelevant unduly prejudicial data re all heavy truck deaths. (See Strick Motion in Limine Re Heavy Truck Death/Injury Rates- DOC. 624) and to inapplicable Canadian standards not in effect at the time of manufacture (See Strick Motion in Limine Re Inapplicable Standards (DOC. 629). Contains significant opinion throughout article about Strick is unable to cross examine a document. Fed. R. Evid. 403. U.S. Const. Amend. 5 and 14; Texas Const. Art. 1 §18.
45.	Underride Crashes: Status Report from Insurance Institute for Highway Safety	Hearsay Fed. R. Evid. 802. Post-accident article dated 3/1/11. No foundation. Further object on the same basis as stated to Exhibit # 44 above.
46.	April 14, 1993, memo from NHTSA regarding Rear Impact	
47.	Email among Strick officers regarding the Torcominian Patent's Underride Guard	Document is not identified with sufficient specificity for Strick to determine whether to object. Assuming this document is Plaintiff's Exhibit 47 from F. Katz's Deposition, Strick has no objection to this exhibit.

48.	Strick Trailer Care and Maintenance Manual	
49.	Strick Trailer Care and Maintenance Manual - Updated Dec 2011	
50.	Strick's Manufacturer's Certification Label	Assuming this is the trailer certification label or the Strick OEM certification label of the horizontal bar, Stick has to objection.
51.	Strick flyer – acknowledging that aftermarket and parts distributor is New Life Transport Parts Center	
52.	Strick's Dealers Names and Locations	
53.	Strick's Parts Nomenclature from New Life Transport Center	
54.	ICC Complete Assembly Orders	
55.	Strick Letter dated June 19, 1998 to customers to retrofit guards to new standards	Irrelevant, misleading and unduly prejudicial. Fed. R. Evid. 402, 403. The subject trailer was equipped with the guard design which is the subject of the letter. Introduction of this letter may suggest to the jury that Strick had an obligation later to recommend retrofit with a 2007 guard, and it had no such duty. See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
56.	Cost Bill of Materials for Rear of Strick Trailer	
57.	Photo1 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	Irrelevant and unduly prejudicial. See Strick's Motion in Limine Re Inapplicable Standards. (DOC 629) No foundation as photographer is not identified

58.	Photo2 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	Irrelevant and unduly prejudicial. See Strick's Motion in Limine Re Inapplicable Standards. (DOC 629) No foundation as photographer is not identified
59.	Photo3 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403. See Strick's Motion in Limine Re Inapplicable Standards. (DOC 629) No foundation as the photographer is not identified.
60.	Strick diagram showing an ICC guard with rounded end	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403. Plaintiff has no expert witness who has opined that a safer alternative design using rounded ends would have changed the performance of the guard in the accident or reduced or prevented the injuries.
61.	Canadian Motor Vehicle 223 Standards effective 2005	The correct effective date of CMVSS 223 is 9/1/07. Irrelevant and unduly prejudicial as it is not applicable in time or location to the subject trailer which was manufactured in 2003 for U.S. use. See Strick's motion in limine re inapplicable standards. (DOC 629.)
62.	List of Underride cases in which Strick has been involved	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403. No foundation of substantial similarity. See Strick's Motion in Limine Re Other Accidents (DOC 634).
63.	Strick Record Retention Policy	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
64.	April 6, 2012 Supplemental Discovery Request to Strick	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
65.	Strick Balance Sheet [CONFIDENTIAL]	Not Constitutionally permitted for a jury to consider Strick's net worth. See Strick's Motion in Limine Re Bifurcate Exemplary Damages, to Exclude Financial Information During the Liability Phase, and to Exclude Extra-Territorial Sales and Revenues in Any Phase (Doc. 651, Page ID 31031-31032)

66.	Canadian Motor Vehicle 223 Test Methods dated 2003	The effective date of CMVSS 223 is 9/1/07. Irrelevant and unduly prejudicial as it is not applicable in time or location to the subject trailer which was manufactured in 2003 for U.S. use. See Strick's motion in limine re inapplicable standards. (DOC 629.)
67.	Strick 1995 Rear Impact Guard Testing Report	Not adequately identified but if not for the Dry Van trailer, irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
68.	Karco Testing Report for Strick Trailers submitted to NHTSA 1999	Irrelevant, unduly prejudicial; Inadmissible other bad act. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion In Limine Re Irrelevant Certification Label Bad Acts (DOC 638)
69.	Texas Peace Officer's Report prepared by Trooper Barkley	Hearsay. Fed. R. Evid. 802.
70.	Excerpt from Texas Peace Officer's Report prepared by Trooper Clint Baughman	Hearsay. Fed. R. Evid. 802. Additional objections may apply but excerpt is not adequately identified.
71.	Excerpt2 from Texas Peace Officer's Report prepared by Trooper Clint Baughman	Hearsay. Fed. R. Evid. 802. Additional objections may apply but excerpt is not adequately identified.
72.	Annual Vehicle Inspection Report for Dolphin Tractor	
73.	Crash Investigation Report from Texas Peace Officer's Report prepared by Trooper Clint Baughman regarding John Fayard Moving & Storage	
74.	Supplemental Investigation report with information obtained from Trooper Barclay	Hearsay. Fed. R. Evid. 802.
75.	Intentionally Omitted	
76.	Intentionally Omitted	

77.	Intentionally Omitted	
78.	IIHS Status Report dated April 17, 2008 re: Crash Avoidance Technologies	
79.	Intentionally Omitted	
80.	Intentionally Omitted	
81.	Intentionally Omitted	
82.	National Transportation Safety Board Special Investigative Report - Prevention of Rear end collisions	
83.	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies	
84.	National Transportation Safety Board's investigation of Truck-Tractor Semitrailer Rear-end Collision into Passenger Vehicles on Interstate 44 Near Miami, Oklahoma June 26, 2009	Hearsay Fed. R. Evid. 802.
85.	Intentionally Omitted	
86.	Intentionally Omitted	
87.	Intentionally Omitted	
88.	Intentionally Omitted	
89.	Intentionally Omitted	
90.	Intentionally Omitted	
91.	Intentionally Omitted	
92.	Intentionally Omitted	
93.	NHTSA's Vehicle Compatibility Research Program	

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94.	Intentionally Omitted	
95.	Intentionally Omitted	
96.	Intentionally Omitted	
97.	Intentionally Omitted	
98.	Intentionally Omitted	
99.	Intentionally Omitted	
100.	Intentionally Omitted	
101.	Intentionally Omitted	
102.	Intentionally Omitted	
103.	Intentionally Omitted	
104.	Intentionally Omitted	
105.	Photo of Volvo truck at accident site (passenger side view)	
106.	Photo of Volvo truck at accident site (front end view)	
107.	Photo of Volvo truck at accident site (showing front end and grill)	
108.	Intentionally Omitted	
109.	Intentionally Omitted	
110.	Intentionally Omitted	
111.	Intentionally Omitted	
112.	Photo of remaining parts of Volvo tractor bumper taken at inspection	
113.	Intentionally Omitted	

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114.	Intentionally Omitted	
115.	Intentionally Omitted	
116.	Intentionally Omitted	
117.	Article - First Order Analysis for Automotive Body Structure Design	
118.	Article - Application of Crash Simulation to Vehicle Development	
119.	Passive Safety - Toyota's use of CAE and FEM	
120.	Document Retention Policy for Toyota Motor Corporation	
121.	The Study of the Frontal Compatibility of Consideration of Interaction and Stiffness	
122.	THUMS Total Human Model for Safety article	
123.	THUMS Total Human Model for Safety 2011 article	
124.	Simulation of Occupant Motion in Rear Impacts using Human FE Model THUMS	
125.	Intentionally Omitted	
126.	Letter dated March 4, 1992 from Saburo Inui to NHTSA discussing FMVSS 210 and manufacturer's freedom on designs	
127.	Photograph of undercarriage of 2010 Toyota 4Runner prepared for NCAP testing	
128.	Photo of undercarriage of Toyota 4Runner Trail model (from Toyota Brochure)	
129.	Narrative of Fuel System from Toyota 4Runner Brochure	
118.  119.  120.  121.  122.  123.  124.  125.  126.	Article - Application of Crash Simulation to Vehicle Development  Passive Safety - Toyota's use of CAE and FEM  Document Retention Policy for Toyota Motor Corporation  The Study of the Frontal Compatibility of Consideration of Interaction and Stiffness  THUMS Total Human Model for Safety article  THUMS Total Human Model for Safety 2011 article  Simulation of Occupant Motion in Rear Impacts using Human FE Model THUMS  Intentionally Omitted  Letter dated March 4, 1992 from Saburo Inui to NHTSA discussing FMVSS 210 and manufacturer's freedom on designs  Photograph of undercarriage of 2010 Toyota 4Runner prepared for NCAP testing  Photo of undercarriage of Toyota 4Runner Trail model (from Toyota Brochure)  Narrative of Fuel System from Toyota	

130.	Narrative and diagram of Fuel Tank components (from Toyota 4Runner Brochure)	
131.	Letter dated March 5, 1993 from Saburo Inui to NHTSA discussing FMVSS 301 and standards for testing tanks	
132.	Narrative and diagram of SRS airbags (from 2010 Toyota Brochure)	
133.	Toyota press release of recall of RAV4 and Highlander vehicles to replace curtain shield airbag sensor assembly	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. Such products are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 590)

134.	Toyota press release of recall of 2011 RAV4 vehicles to replace curtain shield airbag initiator assembly  Picture showing the burning Toyota 4Rupper	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. Such products are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls.  Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)  Unduly prejudicial. Fed. R. Evid. 403. If
135.	Picture showing the burning Toyota 4Runner	photo shows occupants, also objection on basis stated in Strick's Motion In Limine Re Gruesome Evidence (DOC. 627), Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672], and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
136.	Intentionally Omitted	
137.	Toyota Motor Sales' Document Retention Policy	
138.	Toyota 4Runner Ad (No Intelligent Life Out There)	
139.	Toyota 4Runner ad (Rise Above Ordinary)	

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140.	Website advertising of Toyota 4Runner	
141.	September 24, 2009, Press Release announcing launch of 2010 4Runner	
142.	Internet article of Press Release regarding debut of Toyota 4Runner in Dallas	
143.	Sales brochure for 2011 4Runner	
144.	Sales brochure for 2010 4Runner	
145.	Toyota Pocket Source Brochure for 2010 4Runner	
146.	Intentionally Omitted	
147.	Copy of Toyota advertisement (spending a million dollars per hour)	
148.	Toyota 4Runner ad (Star Safety)	
149.	Toyota 2010 Organizational Chart	
150.	Toyota Press Release of recall of selected Lexus models	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403. Admission of other recalls may erroneously give the impression to the jury that all manufacturers have a common law duty to recall. See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)

151.	Toyota Press Release of recall of 4Runners and other vehicle in Southeast Region for Seat Occupant Sensing System	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403. Admission of other recalls may erroneously give the impression to the jury that all manufacturers have a common law duty to recall. See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
152.	Toyota Press Release of recall of certain vehicles for passenger airbag inflator problems	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403. Admission of other recalls may erroneously give the impression to the jury that all manufacturers have a common law duty to recall. See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
153.	Manufacturers Motor Vehicle Specifications for 2010 4Runner	
154.	Toyota 4Runner Owners Warranty Rights Notification	
155.	Main Vehicle Inquiry showing logistics and building of the Greene 4Runner	
156.	Service Serial Master Inquiry for Greene 4Runner	
157.	Texas Dept. of Motor Vehicle history for the Greene 4Runner	
158.	Monroney Label (Sticker Label) for Greene 4Runner	
159.	Toyota Organizational Chart for 2013	
160.	Mills Accident Report	Not adequately identified. If accident concerns trailer underride guards, Strick

		objects on basis stated in its Motion to Exclude Other Incidents [Doc 634]
161.	Diab Accident Report	Not adequately identified. If accident concerns trailer underride guards, Strick objects on basis stated in its Motion to Exclude Other Incidents [Doc 634]
162.	Baker Accident Report	Not adequately identified. If accident concerns trailer underride guards, Strick objects on basis stated in its Motion to Exclude Other Incidents [Doc 634]
163.	Puga Accident Report	Not adequately identified. If accident concerns trailer underride guards, Strick objects on basis stated in its Motion to Exclude Other Incidents [Doc 634]
164.	Schiller Accident Report	Not adequately identified. If accident concerns trailer underride guards, Strick objects on basis stated in its Motion to Exclude Other Incidents [Doc 634]
165.	Snelgrove Accident Report	Not adequately identified. If accident concerns trailer underride guards, Strick objects on basis stated in its Motion to Exclude Other Incidents [Doc 634]
166.	Photo of accident site (Exhibit 1 from Brian Thompson Deposition)	

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167.	Recall letter from NHTSA dated June 25, 2010 of 2010 Lexus HS for noncompliance with FMVSS 301	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
168.	Toyota's July 27, 2010 letter to NHTSA responding to recall notice re 2010 Lexus HS for noncompliance with FMVSS 301	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
169.	Scale diagram of accident scene received from Texas Highway Patrol Division	No foundation. Hearsay. Fed. R. Evid. 802

170.	Information regarding Stop-Sale Order on Toyota Automobiles from U.S., Canada over Flammable Seat Fabric	
171.	Intentionally Omitted	
172.	Intentionally Omitted	
173.	Intentionally Omitted	
174.	NHTSA Publication - Traffic Safety Facts 2006 Data (bates no. GREENE_006711-15)	Hearsay. Fed. R. Evid. 802. No foundation. Strick further objects on the basis of its Motion in Limine on Heavy Truck Fatality Rates. (Doc. 624). If the court rules the evidence is admissible for a limited purpose against other defendant(s).
175.	Toyota Press Release confirming more than 2.2 million vehicles sold in U.S. in 2008.	
176.	Announcement: Toyota Launches New Product Leadership Campaign with its agency Saatchi & Saatchi.	
177.	Ad with mom holding a baby - No matter who you are or what you drive, everyone deserves to be safe	
178.	Ad from front page of Yahoo, shown nationwide, depicting a woman holding a baby and figures of a family of four and the slogan "Everyone deserves safety."	

179.	Ad depicting minorities standing behind Toyota's "everyone deserves to be safe" claim.	Strick objects to any improper and highly prejudicial issue of race into this case. All parties are entitled to a fair trial regardless of the race of Plaintiffs or Defendants. U.S. Const. Amend. 5 and 14; Texas Const. Art.1 §18 Plaintiffs have designated other ads making the point "everyone deserves" safety and Strick takes no position as to admissibility of those advertisements. This one may not be admissible on its face so long as no questions are asked which hint, suggest, or otherwise assert it was improper for Toyota to advertise to minorities.
180.	National ad portraying actor (or employee) who is represented to be a female Automotive Engineer with Toyota.	
181.	National ad portraying actor (or employee) who is represented to be a minority male Automotive Engineer at Toyota.	Strick objects to any improper and highly prejudicial issue of race into this case. All parties are entitled to a fair trial regardless of the race of Plaintiffs or Defendants. U.S. Const. Amend. 5 and 14; Texas Const. Art.1 §18 Plaintiffs have designated other ads making the point "everyone deserves" safety and Strick takes no position as to admissibility of those advertisements. This one may not be admissible on its face so long as no questions are asked which hint, suggest, or otherwise assert it was improper for Toyota to advertise to minorities.
182.	National ad portraying actor (or employee) who is represented to be the Chief Engineer at Toyota.	
183.	National ad alleging that Toyota has set up "Smart Teams," comprising "200 highly trained engineers and technical experts.	

184.	National ad alleging that Toyota has set up "Smart Teams," includes an endorsement from Toyota's "Chief Quality Officer,"	
185.	Toyota T.V. ad depicting a couple, and announcing that Toyota is recognized for being safe.	
186.	Toyota T.V. ad depicting small children, and announcing that Toyota is recognized for being safe.	
187.	announcing that Toyota is recognized for being	Fed. R. Evid. 403 (assuming the court sustains objections to Toyota Motion to Exclude Statements Regarding "Consumer Safety" as Purpose of Suit on behalf of and joined by, all Defendants. (DOC. 672)
188.	family with kids, and announcing that Toyota is recognized for being safe.	Strick objects to any improper and highly prejudicial issue of race into this case. All parties are entitled to a fair trial regardless of the race of Plaintiffs or Defendants. U.S. Const. Amend. 5 and 14; Texas Const. Art.1 §18 Plaintiffs have designated other ads making the point "everyone deserves" safety and Strick takes no position as to admissibility of those advertisements. This one may not be admissible on its face so long as no questions are asked which hint, suggest, or otherwise assert it was improper for Toyota to advertise to minorities.
189.	Toyota T.V. ad with a tagline announcing that Toyota is recognized for being safe.	
190.	Toyota T.V. ad with a tagline announcing that "no other brand has won more (safety awards)."	
191.	National ad - spending \$1 million an hour on safety is displayed prominently on the commercial.	

192.	Rollover Ratings for Midsize SUV's prepared by Insurance Institute for Highway Safety, Highway Loss Data Institute.	
193.	February 24, 2010, testimony of Toyota's CEO, Akio Toyoda, before the U.S. House Committee on Oversight and Government Reform.	
194.	February 9, 2010 Op-Ed in the Washington Post written by Toyota's CEO, Akio Toyoda.	
195.	settle claims related to certain recalls.	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
196.	Press release: Toyota paid a record \$16.4 million fine to the U.S. government for failing to quickly report safety problems.	

197.	Toyota recall in 2010 of thousands of the 2010 Lexus HS 250h due to deadly fuel leaks after collisions	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
198.	Toyota recall of the Lexus GS, IS 250 and IS 350 models in the United States due to potential cracks in fuel pipes.	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)

199.	Toyota recall of 2009-2012 4Runners, Sequoias, and other vehicles because Toyota failed to test the passenger seat occupant sensing system calibration.	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
200.	Toyota recall of hundreds of thousands of RAV4 and Highlander SUVs due to defective curtain shield airbags.	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)

201.	Toyota recall of more RAV4 and Highlander SUV models for defective side curtain shield airbags.	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
202.	Toyota recalls Corolla, Sequoia, Tundra vehicles for defective airbag inflators.	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)

203.		Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
204.	Toyota ad depicting that the 4Runner is used off-road.	
205.	Toyota ad depicting the 4Runner being used for racing.	
206.	Toyota ad - 4Runner has maximum ground clearance.	
207.	Toyota ad of the undercarriage of 2010 Toyota 4Runner 4x4 version - bates SSTSUB13-00166	
208.	Toyota d stating that the 4Runner can "take on any road to anywhere."	
209.	Toyota advertised the 4Runner as "one of the most trustworthy vehicles on the road."	
210.	2010 article noting that Toyota's safety campaign was being blitzed all over the country on virtually every network.	

211.	Advertisement for Toyota 4Runner -"take daily nonstop to the middle of nowherethen return home to tell us about it thanks to the Star Safety System."	
212.	Official Justice Department Press Release Announcing Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	
213.	Official Justice Department Deferred Prosecution Agreement regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	
214.	Official Justice Department Statement of Facts regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	
215.	Toyota Automotive Safety Manual – Bates number 86845-86892	
216.	Slideshow presentation (first 10 pages) – http://www.sc.toyotafinancial.com/web/tfs/pub/contents/investor Relations/Investor 20 Presentation 20April 202013.pdf	
217.	Letter dated June 14, 2010 from Toyota Financial Services regarding amount to be paid to Toyota as a result of the loss of the 4Runner	
218.	Toyota's Annual Report (Form 20-F) for 2010, pursuant to Section 13 of the SEC Act of 1934 (bate-numbers 847962-848163)	
219.	Intentionally Omitted	
220.	Intentionally Omitted	
221.	Intentionally Omitted	
222.	Intentionally Omitted	

223.	Intentionally Omitted	
224.	Intentionally Omitted	
225.	Intentionally Omitted	
226.	Intentionally Omitted	
227.	Intentionally Omitted	
228.	Intentionally Omitted	
229.	NHTSA's 2012 Vehicle Recalls by Manufacturer	Strick objects to admission of any prior recalls of any defendant manufacturer's products which are not at issue in this case. They are irrelevant, unduly prejudicial and seek to impugn the character of the defendant for recalls. Strick is concerned that the admission of recall evidence may lead the jury to believe there is a common law duty of all manufacturers to recall products, when there is not, and cause undue confusion and prejudice. Fed. R. Evid. 402, 403, 404(b). See Strick's Motion in Limine Re Recall and Retrofit (DOC 636); Strick's Motion to Exclude Friedman/Stephenson Opinions Re Recall and Retrofit (DOC 407); and, Strick's Reply Brief (DOC 590)
230.	Intentionally Omitted	
231.	Intentionally Omitted	
232.	Intentionally Omitted	
233.	Intentionally Omitted	
234.	Intentionally Omitted	
235.	Intentionally Omitted	
236.	Intentionally Omitted	

237.	Intentionally Omitted	
238.	Intentionally Omitted	
239.	Intentionally Omitted	
240.	Intentionally Omitted	
241.	Intentionally Omitted	
242.	Intentionally Omitted	
243.	Intentionally Omitted	
244.	Photo of rear of Dolphin-Strick trailer - GREENE_002101	OBJECTION WITHDRAWN
245.	Photo of underside of Dolphin-Strick trailer - GREENE_002238	
246.	Information from Strick's membership group and NHTSA regarding potential costs and benefits of underride guards	OBJECTION: Hearsay. Fed. R. Evid. 802. Not relevant to notice as date of article is after manufacture of the trailer. Large parts of article irrelevant as they related to side underride guard. Plaintiffs' experts have never presented a side underride guard as a safer feasible alternative design. Fed. R. 402, 403.
247.	Strick Trailer's February 2, 1998 Testing Report for "16" Weld-on Bumper Gusset"	
248.	Department of Public Safety Photos (bates no. Toyota 00007-00080)	Strick objects to those photos contained in this set that show remains on the grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] If children are visible also object on grounds stated in Toyota's Motion to Exclude the Children

249.	WFAA News scene photograph (bates no. Toyota_00131)	Hearsay. Fed R. Evid. 802. Fed. R. Evid. 401, 402, 403 and also if remains are showing on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627], and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672], and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
250.	Autopsy of Lakeysha Greene	Hearsay. Fed. R. Evid. 802. Unduly Prejudicial. Fed. R. Evid.403. On grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627], and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
251.	Autopsy of Wyndell Greene, Sr.	Hearsay. Fed. R. Evid. 802. Unduly Prejudicial. Fed. R. Evid.403. Also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627], and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672).
252.	Recording of Kaufman County 9-1-1 call: 025_2010_05_28_182454699 (confirmed by Plaintiffs' Ex. 3)	Hearsay. Fed. R. Evid. 802. Unduly Prejudicial. Fed. R. Evid.403. Also object to portions of call transcripts referring to death of children on grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672] and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages

		Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
253.	Recording of Kaufman County 9-1-1 call: 022_2010_05_28_182454261(confirmed by Plaintiffs' Ex. 3)	Hearsay. Fed. R. Evid. 802. Unduly Prejudicial. Fed. R. Evid.403. Also object to portions of call transcripts referring to death of children on grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672] and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
254.	Recording of Kaufman County 9-1-1 call: 005_2010_05_28_183041417(confirmed by Plaintiffs' Ex. 3)	Hearsay. Fed. R. Evid. 802. Unduly Prejudicial. Fed. R. Evid.403. Also object to portions of call transcripts referring to death of children on grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672] and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
255.	Recording of Kaufman County 9-1-1 call DISPATCHING Elmo Fire and Rescue: 023_2010_05_28_182733167(confirmed by Plaintiffs' Ex. 3)	Hearsay. Fed. R. Evid. 802. Unduly Prejudicial. Fed. R. Evid.403. Also object to portions of call transcripts referring to death of children on grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672] and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)

256.	Affidavit of Texas Department of Transportation Crash Report	Hearsay. Fed. R. Evid. 802. Unduly Prejudicial. Fed. R. Evid.403.
257.	Affidavit of Billing of Reasonable and Necessary Medical Expenses from UT Southwestern Medical Center (bates no. GREENE_006442-006467)	
258.	Medical Examiner's tagged photographs of Wyndell Greene, Sr. (with private parts redacted) (bates no. GREENE_006468-006470)	Unduly Prejudicial. Fed. R. Evid.403. Also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
259.	Medical Expenses from Air Evac Lifeteam to transport Wyndell Greene, Sr. on May 28, 2010	
260.	Affidavit of medical records from Air Evac Lifeteam for Wyndell Greene, Sr. on May 28, 2010 (bates no. GREENE_000125-000137)	
261.	Medical Expenses from Centennial Medical Center	
262.	Photos at accident site (bates no. GREENE_000400-000407)	Unduly Prejudicial. Fed. R. Evid.403. Also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672], and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
263.	Dairy entries in Caring Bridge journal (bates no. GREENE_000432-000453)	Irrelevant, no foundation. Fed. R. Evid. 401, 402, 403. Hearsay. Fed. R. Evid. 802. Also object to the extent the entries refer to grief and anguish over the deaths of the

		children on the grounds stated in Toyota's Motion in Limine to Exclude the Children submitted on behalf of, and joined by, all Defendants. (DOC. 672)
264.	Affidavit of Billing of Reasonable and Necessary Medical Expenses from Parkland Hospital (bates no. GREENE_002820-003115)	
265.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 1 of 8)	
266.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 2 of 8)	
267.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 3 of 8)	
268.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 4 of 8)	
269.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 5 of 8)	
270.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 6 of 8)	
271.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 7 of 8)	
272.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 8 of 8)	

273.	Summary of Wyndell Greene medical expenses paid by Meridian Resource on behalf of Lakeysha Greene	
274.	ETMC EMS Patient Care Records for Wyndell Greene on May 28, 2010	
275.	Dairy entries in Caring Bridge journal (bates no. GREENE_002494-002726)	Irrelevant, no foundation. Fed. R. Evid. 401, 402, 403. Hearsay. Fed. R. Evid. 802. Also object to the extent the entries refer to death of children, grief or mental anguish re same n grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
276.	Lakeysha and Wyndell Greene wedding photo	On grounds stated in Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
277.	Photo of Wesleigh Greene at birth	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
278.	Photo of Wesleigh Greene with her father as he works	On grounds stated in Defendant's Joint Motion in Limine No. 5 Relating to Evidence Regarding any Alleged Damages Concerning or Relating to the Greene Children (DOC 672) and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all

		Defendants (DOC 672)
279.	Photo of Wesleigh Greene at 1 <sup>st</sup> birthday party	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
280.	Photo of Wyndell Greene, Sr. teaching Wesleigh to swim	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
281.	Wesleigh Greene's writings and drawings to her mother	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
282.	Wesleigh Greene's writings and drawings to her mother and father	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
283.	Wyndell Greene, Sr. and Wesleigh Greene at Daughter-Daddy dance	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
284.	Photo of Wesleigh Greene dressed for birthday party	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]

285.	Photo of Wyndell Greene, II at childbirth	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
286.	Photo of Wyndell "Kyle" Greene, II	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
287.	Photo of Wesleigh Greene	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
288.	Photo of Wesleigh and Kyle Greene	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
289.	Short video of Wesleigh Greene	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
290.	Short video of Wyndell Kyle Greene, II	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
291.	Greene Family Photo	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]

292.	Photo of Wesleigh Greene and teacher	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
293.	Wesleigh Greene and classmates	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
294.	Greene Family Photo	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
295.	Greene Family Photo	On grounds stated in Toyota's Motion in Limine No. 5 Relating to Evidence Regarding any Alleged Damages Concerning or Relating to the Greene Children (DOC 672) and Toyota's Motion In Limine No. 6 relating to Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
296.	Photo of Mrs. Marilyn Hardeman and grandkids	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
297.	Photo of Mrs. Ollie Greene and Wesleigh	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]

		On grounds stated in Toyota's Motion to
298.	Memorial Service video for Lakeysha,	Exclude the Children submitted on behalf
	Wesleigh, and Wyndell Greene, II (bates no. GREENE_006435)	of, and joined by, all Defendants. [Doc.
	GREENE_000433)	672], and Toyota's Motion to Exclude
		Evidence Regarding any Alleged Damages
		Concerning or Relating to Lakeysha or
		Wyndell Greene, and joined by all
		Defendants (DOC 672)
		` ′
299.	Printed Memorial Service Program for	On grounds stated Toyota's Motion to
	Lakeysha, Wesleigh, and Wyndell Greene, II	Exclude the Children submitted on behalf
		of, and joined by, all Defendants. [Doc.
		672], and Toyota's Motion to Exclude
		Evidence Regarding any Alleged Damages
		Concerning or Relating to Lakeysha or
		Wyndell Greene, and joined by all
		Defendants (DOC 672)
300.	Video portrait of the Greene family (bates no.	On grounds stated in Toyota's Motion to
	GREENE_006716)	Exclude the Children submitted on behalf
		of, and joined by, all Defendants. [Doc.
		672], and Toyota's Motion to Exclude
		Evidence Regarding any Alleged Damages
		Concerning or Relating to Lakeysha or
		Wyndell Greene, and joined by all
		Defendants (DOC 672)
301.	Video of balloon send-off for Wesleigh Greene	On grounds stated in Toyota's Motion to
	from classmates (bates no. GREENE_000455)	Exclude the Children submitted on behalf
		of, and joined by, all Defendants. (Doc.
		672)
302.	Funeral expenses for Lakeysha, Wesleigh, and	On grounds stated in Toyota's Motion to
	Kyle funeral	Exclude the Children submitted on behalf
		of, and joined by, all Defendants. [Doc.
		672], and Toyota's Motion to Exclude
		Evidence Regarding any Alleged Damages
		Concerning or Relating to Lakeysha or
		Wyndell Greene, and joined by all
		Defendants (DOC 672)

303.	Photo of gravestone for Lakeysha, Kyle and Wesleigh Greene	On grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672], and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
304.	Wyndell Greene's funeral program	On grounds stated in Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
305.	Video 1 of interior and exterior of the Greene residence	Irrelevant and unduly prejudicial. Fed. R. Evid. 401, 402, 403. Also on grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672], and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672], and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
306.	Video 2 of interior and exterior of the Greene residence	Irrelevant and unduly prejudicial. Fed. R. Evid. 401, 402, 403. Also on grounds stated in Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672], and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)

307.	Timeline of critical dates	Hearsay. Fed. R. Evid. 802.
		SUPPLEMENTAL OBJECTION: Ex. 307 is missing from the exhibit set. If this is the same Timeline as identified and provided as
		Ex. 733, Strick maintains its objection on the
		grounds of Hearsay. Fed. R. Evid. 802. Strick reserves the right to further object when
		received.
308.	Dr. Darrell Henderson's Expert Report	Hearsay. Fed. R. Evid. 802.
309.	Curriculum Vitae and testimony list for Dr. Darrell Henderson	Hearsay. Fed. R. Evid. 802.
310.	Photo1 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re
	iio. GREENE_000307-000377)	Gruesome Evidence (DOC. 627) and Toyota's
		Motion to Exclude Evidence Regarding any
		Alleged Damages Concerning or Relating to
		Lakeysha or Wyndell Greene, and joined by
		all Defendants (DOC 672)
311.	Photo2 of Wyndell Greene in Burn Unit (bates	Fed. R. Evid. 401, 402, 403 and also on grounds
	no. GREENE_000387-000399)	stated in Strick's Motion in Limine Re
		Gruesome Evidence (DOC. 627) and Toyota's Motion to Exclude Evidence Regarding any
		Alleged Damages Concerning or Relating to
		Lakeysha or Wyndell Greene, and joined by
		all Defendants (DOC 672)
212	Distance of Warn Lall Consense in Donne Hait (but a	Fed. R. Evid. 401, 402, 403 and also on grounds
312.	Photo3 of Wyndell Greene in Burn Unit (bates	stated in Strick's Motion in Limine Re
	no. GREENE_000387-000399)	Gruesome Evidence (DOC. 627) and Toyota's
		Motion to Exclude Evidence Regarding any
		Alleged Damages Concerning or Relating to
		Lakeysha or Wyndell Greene, and joined by all
		Defendants (DOC 672)

313.	Photo4 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627) and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
314.	Photo5 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627) and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
315.	Photo6 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627) and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
316.	Photo7 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627) and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
317.	Photo8 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627) and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)

318.	Photo9 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627) and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
319.	Skin and Burn Illustrations_0001	
320.	Skin and Burn Illustrations_0002	
321.	Skin and Burn Illustrations_0003	
322.	Skin and Burn Illustrations_0004	
323.	Intentionally Omitted	
324.	Intentionally Omitted	
325.	Expert report of Dr. Trudi Zaplac	Hearsay. Fed. R. Evid. 802.
326.	Curriculum Vitae of Dr. Trudi Zaplac	Hearsay. Fed. R. Evid. 802.
327.	Expert report of Dr. Stan Smith	Hearsay. Fed. R. Evid. 802.
328.	Curriculum Vitae of Dr. Stan Smith and list of cases	Hearsay. Fed. R. Evid. 802.
329.	Wyndell and Lakeysha Greene Tax Returns 2005-2010	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
330.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 1 OF 2	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
331.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 2 OF 2	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
332.	Wyndell Greene payroll records - Merrill Lynch	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.

333.	Lakeysha Greene payroll records – Accenture, Vol 1 of 3	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
334.	Lakeysha Greene payroll records – Accenture, Vol 2 of 3	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
335.	Lakeysha Greene payroll records – Accenture, Vol 3 of 3	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
336.	Lakeysha Greene payroll records - PepsiCo	Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
337.	Expert report of Jeff Vick	Hearsay. Fed. R. Evid. 802.
338.	Curriculum Vitae of Jeff Vick	Hearsay. Fed. R. Evid. 802.
339.	On-Site Photo DSC07094	OBJECTION WITHDRAWN
340.	On-Site Photo DSC07096	OBJECTION WITHDRAWN
341.	On-Site Photos DSC07102 and DSC07123	OBJECTION WITHDRAWN
342.	On-Site Photos DSC07104 and DSC07128	OBJECTION WITHDRAWN
343.	On-Site Photo DSC07105 and DSC07129	OBJECTION WITHDRAWN
344.	On-Site Photo DSC07106 and DSC 07130	OBJECTION WITHDRAWN
345.	On-Site Photo DSC07107 and DSC07136	OBJECTION WITHDRAWN
346.	On-Site Photo DSC07111	OBJECTION WITHDRAWN
347.	On-Site Photo DSC07114	OBJECTION WITHDRAWN
348.	On-Site Photo DSC07116	OBJECTION WITHDRAWN
349.	On-Site Photo DSC07118	OBJECTION WITHDRAWN
350.	On-Site Photo DSC07122	OBJECTION WITHDRAWN
351.	On-Site Aerial Photo MG_6717_4000	OBJECTION WITHDRAWN
352.	On-Site Photo of accident fire	OBJECTION WITHDRAWN
353.	On-Site Photo1 of vehicles at rest	OBJECTION WITHDRAWN
354.	On-Site Photo2 of vehicles at rest	OBJECTION WITHDRAWN

355.	On-Site Photo3 of vehicles at rest	OBJECTION WITHDRAWN
356.	On-Site Photo4 of vehicles at rest	OBJECTION WITHDRAWN
357.	On-Site Photo5 of vehicles at rest	OBJECTION WITHDRAWN
358.	On-Site Photo6 of vehicles at rest	OBJECTION WITHDRAWN
359.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01038	
360.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01039	
361.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01042	
362.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01043	
363.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01045	
364.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01046	
365.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01047	
366.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01051	
367.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01053	
368.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01055	

369.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01056	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude the Children and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
370.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01057	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
371.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01059	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
372.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01060	
373.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01063	
374.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01064	Fed. R. Evid. 401, 402, 403
375.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01065	Fed. R. Evid. 401, 402, 403
376.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01068	

377.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01069	
378.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01070	
379.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01072	
380.	on-scene photo DSC01073	Fed. R. Evid. 401, 402, 403 and on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
381.	on-scene photo DSC01074	Fed. R. Evid. 401, 402, 403 and on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627] and Toyota's Motion to Exclude Evidence Regarding any Alleged Damages Concerning or Relating to Lakeysha or Wyndell Greene, and joined by all Defendants (DOC 672)
382.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01075	
383.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01076	
384.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01077	
385.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01083	
386.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01084	
387.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01099	

388.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01101	Fed. R. Evid. 401, 402, 403 and also on grounds stated in Strick's Motion in Limine Re Gruesome Evidence [DOC. 627]
389.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01102	
390.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01103	
391.	Toyota 4Runner Photo DSC06488	
392.	Toyota 4Runner Photo DSC06489	
393.	Toyota 4Runner Photo DSC07419	
394.	Toyota 4Runner Photo DSC07420	
395.	Toyota 4Runner Photo DSC07421	
396.	Toyota 4Runner Photo DSC07422	
397.	Toyota 4Runner Photo DSC07423	
398.	Toyota 4Runner Photo DSC07424	
399.	Toyota 4Runner Photo DSC07426	
400.	Toyota 4Runner Photo DSC07427	
401.	Toyota 4Runner Photo DSC07428	
402.	Toyota 4Runner Photo DSC07434	
403.	Toyota 4Runner Photo DSC07435	
404.	Toyota 4Runner Photo DSC07436	
405.	Toyota 4Runner Photo DSC07437	
406.	Toyota 4Runner Photo DSC07438	
407.	Toyota 4Runner Photo DSC07456	

408.	Toyota 4Runner Photo DSC07457
409.	Toyota Corolla Photo DSC07468
410.	Toyota 4Runner Photo DSC07470
411.	Toyota 4Runner Photo DSC07634
412.	Toyota Corolla Photo DSC07550
413.	Toyota Corolla Photo DSC07551
414.	Toyota Corolla Photo DSC07552
415.	Toyota Corolla Photo DSC07553
416.	Toyota Corolla Photo DSC07554
417.	Toyota Corolla Photo DSC07562
418.	Toyota Corolla Photo DSC07568
419.	Toyota Corolla Photo DSC07583
420.	Toyota Corolla Photo DSC07586
421.	Toyota Corolla Photo DSC07595
422.	Toyota Corolla Photo DSC07597
423.	Toyota Corolla Photo DSC07604
424.	Toyota Corolla Photo DSC07611
425.	Toyota Corolla Photo DSC07655
426.	Toyota Corolla Photo DSC07656
427.	Toyota Corolla Photo DSC07662
428.	Toyota Corolla Photo DSC07663
429.	Volvo VN Tractor Photo DSC07261
430.	Volvo VN Tractor Photo DSC07263

431.	Volvo VN Tractor Photo DSC07264	
432.	Volvo VN Tractor Photo DSC07266	
433.	Volvo VN Tractor Photo DSC07357	
434.	Volvo VN Tractor Photo DSC07358	
435.	Volvo VN Tractor Photo DSC07360	Fed. R. Evid. 401, 402, 403 and also if remains are showing on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627)
436.	Volvo VN Tractor Photo DSC07381	Fed. R. Evid. 401, 402, 403 and also if remains are showing on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC. 627)
437.	Two photos of Volvo VN tractor at tow yard (bates no. GREENE_006505-06)	
438.	Photo of Fayard Freightliner tractor (bates no. GREENE_001123)	
439.	Photo of Fayard Freightliner tractor (bates no. GREENE_001124)	
440.	Photo of Fayard Freightliner tractor (bates no. GREENE_001213)	
441.	Photo of Fayard Freightliner tractor (bates no. GREENE_001224)	
442.	Photo of Fayard Freightliner tractor (bates no. GREENE_001226)	
443.	Photo of Fayard Freightliner tractor (bates no. GREENE_001231)	
444.	Photo of Fayard Freightliner tractor (bates no. GREENE_001232)	

445.	Photo of Fayard Freightliner tractor (bates no. GREENE_001233)	
446.	Photo of Fayard Freightliner tractor (bates no. GREENE_001236)	
447.	Photo of Fayard Freightliner tractor (bates no. GREENE_001240)	
448.	Photo of Fayard Freightliner tractor (bates no. GREENE_001242)	
449.	Photo of Fayard Freightliner tractor (bates no. GREENE_001243)	
450.	Photo of Fayard Freightliner tractor (bates no. GREENE_001245)	
451.	Photo of Fayard Freightliner tractor (bates no. GREENE_001246)	
452.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001273)	
453.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001274)	
454.	VinLink VIN information for Toyota 4Runner	
455.	VinLink VIN information for Toyota Corolla	
456.	2006 TOYOTA COROLLA 4 DOOR SEDAN AutoStats	
457.	2010 TOYOTA 4RUNNER 4 DOOR 4X2 UTILITY AutoStats	
458.	StifCalc Rear Impact Test Summary Report	Hearsay. Fed. R. Evid. 802
459.	StifCalc Rear Impact Test Summary Report- Utility vehicles	Hearsay. Fed. R. Evid. 802

460.	Equations and Calculations from Jeff Vick	Object on basis of failure to timely produce. See Strick Motion re Vick calculations. (DOC 409)
461.	Volvo Point of Perception - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
462.	Volvo Braking Begins - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
463.	Volvo 4 Runner Impact - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
464.	4 Runner Corolla Impact - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
465.	Volvo 4 Runner Corolla impact - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
466.	4 Runner Volvo Separation - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
467.	4 Runner Strick Trailer Impact - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
468.	Strick Trailer Impact - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.

469.	Tool Box Impact - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
470.	Vehicle Final Rest Position - diagram	Strick assumes this diagram is one produced by J. Vick. If not, Plaintiffs' need to adequately identify this exhibit as Strick may have further objections.
471.	Texas Dept. of Public Safety - Highway Patrol Officer Measurements	
472.	Friedman Research Expert Report - Toyota	Hearsay. Fed. R. Evid. 802; Many entries irrelevant, unduly prejudicial. Fed. R. Evid. 402, 403.
473.	Intentionally Omitted	
474.	Friedman Research Expert Report - Strick	Hearsay. Fed. R. Evid. 802; Many entries irrelevant, unduly prejudicial. Fed. R. Evid. 402, 403.
475.	Friedman Research Expert Report – Fayard and Dolphin	Hearsay. Fed. R. Evid. 802; Many entries irrelevant, unduly prejudicial. Fed. R. Evid. 402, 403.
476.	Curriculum Vitae of Keith Friedman	Hearsay. Fed. R. Evid. 802
477.	Curriculum Vitae of Dr. R. Rhodes Stephenson	Hearsay. Fed. R. Evid. 802
478.	Fire bibliography – marked as Exhibit 6 to Dr. Stephenson deposition	Hearsay. Fed. R. Evid. 802; Many entries irrelevant, unduly prejudicial. Fed. R. Evid. 402, 403.
479.	Supplemental bibliography (marked as Exhibit 7 to Dr. Stephenson's deposition"	Hearsay. Fed. R. Evid. 802; Many entries irrelevant, unduly prejudicial. Fed. R. Evid. 402, 403.
480.	Additional research considered (marked as Exhibit 8 to Dr. Stephenson's deposition)	Hearsay. Fed. R. Evid. 802; Many entries irrelevant, unduly prejudicial. Fed. R. Evid. 402, 403.

481.	Toyota ad directed towards consumers in Mr. Greene's demographic	Strick objects to any improper and highly prejudicial issue of race into this case. All parties are entitled to a fair trial regardless of the race of Plaintiffs or Defendants. U.S. Const. Amend. 5 and 14; Texas Const. Art.1 §18 Plaintiffs have designated other ads making the point "everyone deserves" safety and Strick takes no position as to admissibility of those advertisements. This one may not be admissible on its face so long as no questions are asked which hint, suggest, or otherwise assert it was improper for Toyota to advertise to minorities.
482.	The 2010 Toyota 4Runner	With the understanding that this is the subject 4Runner, Strick has no objection to a jury view.
483.	Exemplar of fuel tank from 2010 Toyota 4Runner	
484.	Photo of dislodged underride guard (bates no. GREENE_000903)	
485.	Photo of dislodged underride guard (bates no. GREENE_000904)	
486.	2010 Toyota 4Runner LF Quarter Panel Comparison between Replacement and Incident Vehicle	Strick does not understand what this exhibit is. Plaintiff needs identify this exhibit and upon identifying this exhibit, Strick may have further objections.
487.	Comparison tank crush - Photo of end of tank to end of shield	
488.	Photos of Greene fuel tank damage and impacts from accident	
489.	photo of identification of 4Runner roof replacement	
490.	photo of impact of area of 4Runner with trailer	

491.	Photos of underride guard at accident scene	Assuming this is one of the police photographs, Strick has no objection (although this appears appears to be duplicative of other exhibits listed above. If it is not a police photo, need identification of photographer.
492.	Photo of Greene vehicle at accident scene	Fed. R. Evid. 401, 402, 403 and also if remains are showing on grounds stated in Strick's Motion in Limine Re Gruesome Evidence (DOC.627)
493.	Photos of examples of underride mountings	Need better identification of exhibit (including make/model/model year of mountings,, who prepared and representation as to whether previously produced
494.	Photos of example in use underride guard	Strick assumes this is a photograph of Strick's 2007 guard designed to meet the Canadian standard. If so, Strick objects on the basis stated in Strick's Motion in Limine Re Inapplicable Standards, Argument Section C, Doc. 629 Page ID's 30695-30697. Fed. R. Evid. 402, 403, 407.
495.	Repair quote of accident trailer arranged by Fayard	Fed. R. Evid. 402, 403.
496.	Bates# Dolphin-0320 - Annual Vehicle Inspection Report for Dolphin Line Vehicle dated 5-6-2009	
497.	Photos of underride guards that Fayard installed on the Strick trailer	
498.	Violations discovered by TXPDS Commercial Vehicle Enforcement (TX10440EAQ01, CD# 0798253, 5/28/2010	

499.	Documents included with purchase of Strick authorized parts - no instructions	Irrelevant and unduly prejudicial. No foundation that Strick supplied an aftermarket underride guard assembly for this trailer. Which underride guard this is or from whom Plaintiffs' expert Friedman purchased it is not clear. No chain of custody from Strick through the dealer from whom purchased and could have been dealer's oversight. This is also post-accident. Fed. R. Evid. 402, 403, 404(b), 602.
500.	Photo of Strick part, with label	
501.	Photo of Strick underride guard as received	
502.	Photo of Strick underride guard test	
503.	Underride guard P3 test results	Not sufficiently identified. If this is a page out of Strick's FMVSS 223 compliance test on the subject guard design, under the optional completeness rule, Strick requests the entire document be admitted as this portion only is unfair and unduly prejudicial. Fed. R. Evid. 106. Fed. R. Evid. 403.
504.	Photo illustrations of underride guard designs that are welded to cross tube	Not sufficiently identified. Irrelevant and unduly prejudicial. Fed. R. Evid. 402, 403.
505.	Comparison illustrations of underride guards	
506.	Illustration of Strick tested version of underride guard had bolts on the top bracket	Not sufficiently identified and not timely produced or identified in expert report.

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507.	Document - Strick bill of materials that proves they knew trailer was for Dolphin Line (customer)	
508.	Photos of scratch marks on incident Toyota 4Runner on pavement and partial shield	
509.	Photos of Volvo front end and flexible bumper fascia that fell off	
510.	Figure - Comparison of FMVSS Stopping Distance Requirements from 60 mph	
511.	Intentionally Omitted	
512.	Excerpt of FE modeling from Toyota Bates 754674-754682	
513.	Excerpt of FE modeling from Toyota Bates 754683-754688	
514.	Excerpt of FE modeling from Toyota Bates 754689-754697	
515.	Passive Safety - Finite Element Modeling	
516.	Excerpt of FE modeling of Toyota partial body	Insufficient information to identify the exhibit, Strick has requested Plaintiffs' better describe or produce the exhibits but they have not done so. Strick requests that the exhibit be stricken from the record, and further object as being untimely produced, or not produced at all, and unduly prejudicial. Fed. R. Evid. 402, 403.

517.	Excerpt of FE modeling of Toyota 4Runner	Insufficient information to identify the exhibit, Strick has requested Plaintiffs' better describe or produce the exhibits but they have not done so. Strick requests that the exhibit be stricken from the record, and further object as being untimely produced, or not produced at all, and unduly prejudicial. Fed. R. Evid. 402, 403.
518.	2010 vs 2014 Toyota 4Runner rear portion comparison	Insufficient information to identify the exhibit, Strick has requested Plaintiffs' better describe or produce the exhibits but they have not done so. Strick requests that the exhibit be stricken from the record, and further object as being untimely produced, or not produced at all, and unduly prejudicial. Fed. R. Evid. 402, 403.
519.	Photo of 2010 Toyota 4Runner fuel tank distance to rear axle	
520.	Comparison illustrations 2010 Toyota 4Runner with fuel tank	
521.	Toyota frame, tank, body deformation illustration	
522.	2010 Toyota 4Runner fuel tank with labels and test results	
523.	Photo - side view of driver rear frame - incident 2010 Toyota 4Runner	
524.	Photo from Toyota Rav4	
525.	Alternative design of fuel tank placement	
526.	Alternative frame design and fuel tank placement	
527.	Check valve illustrations	

528.	Illustration of fuel tanks Toyota vehicles - 1994 4Runner, 2008 Rav4, 2008 Sequoia	
529.	Illustration of fuel tank - 2006 Toyota 4Runner	
530.	Test Results and comparison of 2010 Toyota 4Runner with other vehicle fuel system designs	
531.	Exhibit 12 from Keith Friedman Deposition	
532.	Illustrations of leak testing, accident scene information, and vehicle characteristics	
533.	Illustrations related to Strick underride guard, including photos of components and scene photos	Insufficient information; object to late produced and not timely produced or identified in expert report.
534.	Illustrations of Toyota 4Runner exemplar fuel system components	
535.	Illustrations of Toyota parts and Strick trailer	
536.	Illustrations related to Strick underride guard, including subject trailer and installation instructions	Insufficient information; object to late produced and not timely produced or identified in expert report.  SUPPLEMENTAL OBJECTION: Exhibit
		description is inaccurate. Exhibit consists of three photographs, one of which is annotated, and FMVSS 571.223 S5.5., no installation instructions, and a photograph of an unidentified trailer/underride guard.
537.	illustrations of Strick Toyota and Volvo parts and concepts	OBJECTION WITHDRAWN

538.	Illustration of 2003 Strick welded underride guard	Insufficient information; object to late produced and not timely produced or identified in expert report.  SUPPLEMENTAL OBJECTION: No Foundation. The exhibit is an annotated photograph of a 2003 MY Strick trailer inspected by Plaintiff's expert more than 10 years later, in January of 2014. It is equipped with a non-OE underride guard unknown date, source, or date attached (See Freedman's Deposition pgs. 511-514 re his lack of knowledge of maintenance history). More prejudicial than probative. Fed. R. Evid. 403. The caption is misleading as it implies Strick was producing OE welded underride guards in 2003, when it was not.
539.	Illustration of Toyota part and trailer	OBJECTION WITHDRAWN
540.	illustration of Toyota 4runners	OBJECTION WITHDRAWN
541.	illustration of Toyota parts (fuel tank, tank strap and shield)	OBJECTION WITHDRAWN
542.	illustration of alternative frame designs	
543.	Illustration of Volvo tractor frame and parts	

544.	Illustration of accident vehicle parts	Insufficient information; object to late produced and not timely produced or identified in expert report.  SUPPLEMENTAL OBJECTION: Ex. 544 is missing from the exhibit set. Strick has requested a copy and reserves the right to further object when received.
545.	Illustration of Toyota Fuel Tank Skid Plate Underside Striations	
546.	Illustration of various fuel tanks	
547.	Illustration of Toyota shield	
548.	Illustration of seat belt usage	OBJECTION: Exhibit Produced appears to be First Responder removing remains at the scene of the accident. See Strick's Motion in Limine Re Gruesome Evidence [Doc. 627] and Toyota's Motion to Exclude the Children submitted on behalf of, and joined by, all Defendants. [Doc. 672]
549.	Illustration of accident vehicle fuel tank damage	
550.	Illustration of accident vehicle damage	
551.	Illustration of accident vehicle damage (Rear Axle Bracket and Stabilizer Link Impact with Rear of Muffler)	
552.	Illustration of rear axle forward motion	
553.	Illustration of strap bending and rear fuel tank deformation	
554.	Illustration of fuel tank bending and other vehicle damage	
555.	Visual comparison of 2010 and 2014 4Runners	

556.	Illustration of locations of fuel tanks by other manufacturers	
557.	Radar collision mitigation scenarios (Ex. 26 at Friedman Deposition)	
558.	Illustration of vehicle damage to 4Runner and Strick trailer	OBJECTION: Exhibit appears to represent a new undisclosed expert opinion, which is prejudicial to defendant Strick and too late to cure or respond to.
559.	Illustration of replacement Strick underride guards	OBJECTION: Strick objects to the photograph of the white underride guard if it is a Canadian rear impact guard on the grounds stated in Strick's Motion re Inapplicable Standards
560.	Illustration of vehicle damage, scene, parts	
561.	Illustration of Toyota parts	
562.	Illustration of Toyota parts	
563.	Illustration of Toyota parts	
564.	Illustration of Toyota parts	
565.	Illustration of Toyota parts	
566.	Illustration of Toyota parts	
567.	Illustration of Toyota parts	
568.	Illustration of Toyota parts	
569.	Illustration of Toyota parts	

570.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
571.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

572.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also
		prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
573.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		supplemental objection: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

574.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
575.	Demonstrative video – 4Runner component parts	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

576.	Demonstrative video – 4Runner component parts  Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.  Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr.
		Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for
		its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
578.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

579.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
580.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
581.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

582.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
583.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
584.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

585.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
586.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
587.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
588.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
589.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
590.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
591.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
592.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

502	Domonotastino video 4D-	Insufficient description. Not produced
593.	Demonstrative video – 4Runner component parts	previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37
594.	Domonstrativa vidas ABunnar samnanant	Insufficient description. Not produced
394.	Demonstrative video – 4Runner component	previously or late produced. Not described in
	parts	Rule 26 expert report. Fed. R. Evid. 37
595.	Demonstrative vides Heavy Truck into	Insufficient description. Not produced
393.	Demonstrative video – Heavy Truck into	previously or late produced. Not described in
	4Runner	Rule 26 expert report. Fed. R. Evid. 37
596.	Demonstrative video – Heavy Truck into	Insufficient description. Not produced
370.	4Runner	previously or late produced. Not described in
	4Kumei	Rule 26 expert report. Fed. R. Evid. 37
597.	Domonstrativa vidas ABunnar samnanant	Insufficient description. Not produced
397.	Demonstrative video – 4Runner component	previously or late produced. Not described in
	parts	Rule 26 expert report. Fed. R. Evid. 37
500	Demonstrative vides Heavy Twelvints	Insufficient description. Not produced
598.	Demonstrative video – Heavy Truck into	previously or late produced. Not described in
	4Runner	Rule 26 expert report. Fed. R. Evid. 37
<b>7</b> 00		Insufficient description. Not produced
599.	Demonstrative video – Heavy Truck into	previously or late produced. Not described in
	4Runner	Rule 26 expert report. Fed. R. Evid. 37
		Insufficient description. Not produced
600.	Demonstrative video – 4Runner component	previously or late produced. Not described in
	parts	Rule 26 expert report. Fed. R. Evid. 37
c0.1	5	Insufficient description. Not produced
601.	Demonstrative video – Heavy Truck into	previously or late produced. Not described in
	4Runner	Rule 26 expert report. Fed. R. Evid. 37
		Insufficient description. Not produced
602.	Demonstrative video – Heavy Truck into	previously or late produced. Not described in
	4Runner	Rule 26 expert report. Fed. R. Evid. 37
		Insufficient description. Not produced
603.	Demonstrative video – Heavy Truck into	previously or late produced. Not described in
	4Runner	Rule 26 expert report. Fed. R. Evid. 37
604.	Demonstrative video – 4Runner into Strick	Insufficient description. Not produced
	Trailer	previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37

605.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
606.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
607.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
608.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
609.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
610.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
611.	Demonstrative video – Heavy Truck into 4Runner	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
612.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick
		as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

613.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr.
		Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
614.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr.
		Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

615.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input
616.	Demonstrative video – 4Runner into Strick Trailer	and output data has not been provided.  Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

617.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
618.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA
		simulation video which was not previously
		produced to Strick. FEA input and output
		data have not been produced. No
		foundation. Extremely prejudicial to Strick
		as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given.
		Strick has filed an emergency motion for
		relief on the time, but Strick is also
		prejudiced by not having sufficient time for
		its experts to respond to and rebut Mr.
		Friedman's voluminous newly produced
		work, especially since the simulation input
		and output data has not been provided.

619.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input
620.	Demonstrative video – 4Runner into Strick Trailer	and output data has not been provided.  Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

621.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for
		its experts to respond to and rebut Mr. Friedman's voluminous newly produced
		work, especially since the simulation input
		and output data has not been provided.
622.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA
		simulation video which was not previously
		produced to Strick. FEA input and output data have not been produced. No
		foundation. Extremely prejudicial to Strick
		as amount of time allotted to depose Mr.
		Friedman on his FEA is insufficient given.
		Strick has filed an emergency motion for relief on the time, but Strick is also
		prejudiced by not having sufficient time for
		its experts to respond to and rebut Mr.
		Friedman's voluminous newly produced
		work, especially since the simulation input and output data has not been provided.

623.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input
624.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

625.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
626.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
627.	Demonstrative video – 4Runner fuel system design	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

628.	Demonstrative video – 4Runner fuel system design	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
629.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA
		simulation video which was not previously
		produced to Strick. FEA input and output
		data have not been produced. No
		foundation. Extremely prejudicial to Strick
		as amount of time allotted to depose Mr.
		Friedman on his FEA is insufficient given.
		Strick has filed an emergency motion for
		relief on the time, but Strick is also
		prejudiced by not having sufficient time for its experts to respond to and rebut Mr.
		Friedman's voluminous newly produced
		work, especially since the simulation input
		and output data has not been provided.
630.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA
		simulation video which was not previously
		produced to Strick. FEA input and output
		data have not been produced. No
		foundation. Extremely prejudicial to Strick
		as amount of time allotted to depose Mr.
		Friedman on his FEA is insufficient given.
		Strick has filed an emergency motion for
		relief on the time, but Strick is also
		prejudiced by not having sufficient time for
		its experts to respond to and rebut Mr.
		Friedman's voluminous newly produced work, especially since the simulation input
		and output data has not been provided.
		and output data has not been provided.

631.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		supplemental objection: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
632.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

633.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
634.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		supplemental objection: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.

635.	Demonstrative video – 4Runner into Strick Trailer	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
		SUPPLEMENTAL OBJECTION: FEA simulation video which was not previously produced to Strick. FEA input and output data have not been produced. No foundation. Extremely prejudicial to Strick as amount of time allotted to depose Mr. Friedman on his FEA is insufficient given. Strick has filed an emergency motion for relief on the time, but Strick is also prejudiced by not having sufficient time for its experts to respond to and rebut Mr. Friedman's voluminous newly produced work, especially since the simulation input and output data has not been provided.
636.	Demonstrative video – psi fill for fuel tank	OBJECTION WITHDRAWN
637.	Demonstrative video – fuel tank leak video	OBJECTION WITHDRAWN
638.	Demonstrative video – IIHS crash test	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: Strick objects to tests of Canadian rear impact guard on the basis stated in its Motion in Limine re Inapplicable Standards (Doc 629) and Unduly prejudicial. Fed. R. Evid. 403

639.	Demonstrative video – IIHS crash test	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37  SUPPLEMENTAL OBJECTION: Strick objects to tests of Canadian rear impact guard on the basis stated in its Motion in Limine re Inapplicable Standards (Doc 629) and Unduly prejudicial. Fed. R. Evid. 403
640.	Friedman/Stephenson Analysis of Evidence Photo 9	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
641.	Friedman/Stephenson Analysis of Evidence Photo 10	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
642.	Friedman/Stephenson Analysis of Evidence Photo 11	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
643.	Friedman/Stephenson Analysis of Evidence Photo 12	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
644.	Friedman/Stephenson Analysis of Evidence Photo 13	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
645.	Friedman/Stephenson Analysis of Evidence Photo 14	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
646.	Friedman/Stephenson Analysis of Evidence Photo 15	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
647.	Friedman/Stephenson Analysis of Evidence Photo 16	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
648.	Friedman/Stephenson Analysis of Evidence Photo 17	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

649.	Friedman/Stephenson Analysis of Evidence Photo 18	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
650.	Friedman/Stephenson Analysis of Evidence Photo 19	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
651.	Friedman/Stephenson Analysis of Evidence Photo 20	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
652.	Friedman/Stephenson Analysis of Evidence Photo 21	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
653.	Friedman/Stephenson Analysis of Evidence Photo 22	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
654.	Friedman/Stephenson Analysis of Evidence Photo 23	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
655.	Friedman/Stephenson Analysis of Evidence Photo 24	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
656.	Friedman/Stephenson Analysis of Evidence Photo 25	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
657.	Friedman/Stephenson Analysis of Evidence Photo 26	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
658.	Friedman/Stephenson Analysis of Evidence Photo 27	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
659.	Friedman/Stephenson Analysis of Evidence Photo 28	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
660.	Friedman/Stephenson Analysis of Evidence Photo 29	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

661.	Friedman/Stephenson Analysis of Evidence Photo 30	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
662.	Friedman/Stephenson Analysis of Evidence Photo 31	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
663.	Friedman/Stephenson Analysis of Evidence Photo 32	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
664.	Friedman/Stephenson Analysis of Evidence Photo 33	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
665.	Friedman/Stephenson Analysis of Evidence Photo 34	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
666.	Friedman/Stephenson Analysis of Evidence Photo 35	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
667.	Friedman/Stephenson Analysis of Evidence Photo 36	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
668.	Friedman/Stephenson Analysis of Evidence Photo 37	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
669.	Friedman/Stephenson Analysis of Evidence Photo 38	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
670.	Friedman/Stephenson Analysis of Evidence Photo 39	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
671.	Friedman/Stephenson Analysis of Evidence Photo 40	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
672.	Friedman/Stephenson Analysis of Evidence Photo 41	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
673.	Friedman/Stephenson Analysis of Evidence Photo 42	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

674.	Friedman/Stephenson Analysis of Evidence Photo 43	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
675.	Friedman/Stephenson Analysis of Evidence Photo 44	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
676.	Friedman/Stephenson Analysis of Evidence Photo 45	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
677.	Friedman/Stephenson Analysis of Evidence Photo 46	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
678.	Friedman/Stephenson Analysis of Evidence Photo 47	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
679.	Friedman/Stephenson Analysis of Evidence Photo 48	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
680.	Friedman/Stephenson Analysis of Evidence Photo 49	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
681.	Friedman/Stephenson Analysis of Evidence Photo 50	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
682.	Friedman/Stephenson Analysis of Evidence Photo 51	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
683.	Friedman/Stephenson Analysis of Evidence Photo 52	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
684.	Friedman/Stephenson Analysis of Evidence Photo 53	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
685.	Friedman/Stephenson Analysis of Evidence Photo 54	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
686.	Friedman/Stephenson Analysis of Evidence Photo 55	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37

697	Eriadman/Stanhangan Analysis of Evidance	Insufficient description. Not produced
687.	Friedman/Stephenson Analysis of Evidence	previously or late produced. Not described in
	Photo 56	Rule 26 expert report. Fed. R. Evid. 37
688.	Friedman/Stephenson Analysis of Evidence	Insufficient description. Not produced
000.	1	previously or late produced. Not described in
	Photo 57	Rule 26 expert report. Fed. R. Evid. 37
689.	Friedman/Stephenson Analysis of Evidence Photo 58	Insufficient description. Not produced
007.		previously or late produced. Not described in
	1 11000 30	Rule 26 expert report. Fed. R. Evid. 37
690.	Friedman/Stephenson Analysis of Evidence Photo 59	Insufficient description. Not produced
030.		previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37
691.	Friedman/Stephenson Analysis of Evidence	Insufficient description. Not produced
091.	1	previously or late produced. Not described in
	Photo 60	Rule 26 expert report. Fed. R. Evid. 37
692.	Eriadman/Stanbanson Analysis of Evidence	Insufficient description. Not produced
092.	Friedman/Stephenson Analysis of Evidence	previously or late produced. Not described in
	Photo 61	Rule 26 expert report. Fed. R. Evid. 37
693.	Friedman/Stephenson Analysis of Evidence Photo 62	Insufficient description. Not produced
0,5.		previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37
694.	Friedman/Stephenson Analysis of Evidence Photo 63	Insufficient description. Not produced
074.		previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37
695.	Friedman/Stephenson Analysis of Evidence	Insufficient description. Not produced
075.		previously or late produced. Not described in
	Photo 64	Rule 26 expert report. Fed. R. Evid. 37
696.	Friedman/Stephenson Analysis of Evidence Photo 1	Insufficient description. Not produced
090.		previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37
607	Enjadman/Stanbangan Analysis of Evidence	Insufficient description. Not produced
697.	Friedman/Stephenson Analysis of Evidence	previously or late produced. Not described in
	Photo 2	Rule 26 expert report. Fed. R. Evid. 37
698.	Friedman/Stephenson Analysis of Evidence Photo 3	Insufficient description. Not produced
370.		previously or late produced. Not described in
	riloto 3	Rule 26 expert report. Fed. R. Evid. 37
699.	Friedman/Stephenson Analysis of Evidence Photo 4	Insufficient description. Not produced
		previously or late produced. Not described in
		Rule 26 expert report. Fed. R. Evid. 37

700.	Friedman/Stephenson Analysis of Evidence Photo 5	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
701.	Friedman/Stephenson Analysis of Evidence Photo 6	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
702.	Friedman/Stephenson Analysis of Evidence Photo 7	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
703.	Friedman/Stephenson Analysis of Evidence Photo 8	Insufficient description. Not produced previously or late produced. Not described in Rule 26 expert report. Fed. R. Evid. 37
704.	Illustration of Toyota parts	OBJECTION WITHDRAWN
705.	Illustration of Toyota parts	OBJECTION WITHDRAWN
706.	Illustration of Toyota parts	OBJECTION WITHDRAWN
707.	Photos of cab interior of Daniel Sprinkle's tractor	
708.	Cost information for Toyota fuel tank protectors if purchased from parts seller	
709.	February 28, 2011 letter from the Insurance Institute for Highway Safety to National Highway Traffic Safety Administration: Petition for Rulemaking; 49 CFR Part 571 Federal Motor Vehicle Safety Standards; Rear Impact Guards; Rear Impact Protection	Object on the Basis stated in Strick's Motion In Limine Re Inapplicable Standards (DOC 629). Fed. R. Evid. 402, 403, 802; No foundation; Deprives Strick of the right of due process of law. U.S. Const. Amend. 5 and 14; Texas Const. Art. 1 §18.
710.	Insurance Institute for Highway Safety News Release: Underride guards on big rigs often fail in crashes; Institute petitions government for new standard	Object on the Basis stated in Strick's Motion In Limine Re Inapplicable Standards (DOC 629). Fed. R. Evid. 402, 403, 802; No foundation; deprives Strick of the right of due process of law. U.S. Const. Amend. 5 and 14; Texas Const. Art. 1 §18.

711.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 46, No. 2, March 1, 2011: Underride Crashes	Object on the Basis stated in Strick's Motion In Limine Re Inapplicable Standards (DOC 629). Fed. R. Evid. 402, 403, 802; No foundation; deprives Strick of the right of due process of law. U.S. Const. Amend. 5 and 14; Texas Const. Art. 1 §18.
712.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 47, No. 5, July 3, 2012: Special Issue: Crash Avoidance	
713.	Insurance Institute for Highway Safety Bulletin Vol. 29, No. 5, April 2012: Volvo collision avoidance features: initial results	
714.	Expert report of Dr. Joseph Burton	Hearsay. Fed. R. Evid. 802.
715.	Curriculum Vitae of Dr. Joseph Burton	Hearsay. Fed. R. Evid. 802.
716.	Collection of Dr. Burton's Vehicle Inspection Photographs	
717.	Dr. Burton Rear Impact Case list	Hearsay. Fed. R. Evid. 802.
718.	Dr. Burton Underride Case list	Hearsay. Fed. R. Evid. 802.
719.	Dr. Burton Fuel-fed Fires Cases list	Hearsay. Fed. R. Evid. 802.
720.	Dr. Burton Lateral Impact Cases list	Hearsay. Fed. R. Evid. 802.
721.	Dr. Burton Rear Impact Bibliography	Hearsay. Fed. R. Evid. 802. Irrelevant as this is a generic bibliography covering a wide swath of topics not at issue
722.	Dr. Burton Fire / CO Bibliography	Hearsay. Fed. R. Evid. 802. Irrelevant as this is a generic bibliography covering a wide swath of topics not at issue
723.	Dr. Burton Side Impact Bibliography	Hearsay. Fed. R. Evid. 802.
724.	Dr. Burton Underride Bibliography	Hearsay. Fed. R. Evid. 802.
725.	Dr. Burton Head Injury Bibliography	Hearsay. Fed. R. Evid. 802.
726.	Dr. Burton Human Tolerance Bibliography	Hearsay. Fed. R. Evid. 802.

727.	Dr. Burton Pain & Suffering Bibliography	Hearsay. Fed. R. Evid. 802.
728.	Dr. Burton Diagnosis of Seat Belt Usage Bibliography	Hearsay. Fed. R. Evid. 802.
729.	Dr. Burton Seat Belt Bibliography	Hearsay. Fed. R. Evid. 802.
730.	Dr. Burton Forensic Textbook Bibliography	Hearsay. Fed. R. Evid. 802.
731.	Papers authored by Dr. Burton	Hearsay. Fed. R. Evid. 802.
732.	Dr. Burton's 4Runner inspection notes	Hearsay. Fed. R. Evid. 802.
733.	Timeline of critical dates	Insufficiently Identified.
		SUPPLEMENTAL OBJECTION: Hearsay. Fed. R. Evid. 802.
734.	Frank Katz email regarding Canadian bumper and cost per unit	Irrelevant and unduly prejudicial as it is not applicable in time or location to the subject trailer which was manufactured in 2003 for U.S. use. Fed. R. Evid. 402, 403. See Strick's motion in limine re inapplicable standards. (DOC 629.)
735.	Frank Katz email regarding Canadian bumper	SUPPLEMENTAL OBJECTION: Irrelevant and unduly prejudicial as it is not applicable in time or location to the subject trailer which was manufactured in 2003 for U.S. use. Fed. R. Evid. 402, 403. See Strick's motion in limine re inapplicable standards. (DOC 629.)
736.	Email regarding TTMA conference on Lufkin verdict	SUPPLEMENTAL OBJECTION: Irrelevant and unduly prejudicial as it is not applicable in time or location to the subject trailer which was manufactured in 2003 for U.S. use. Fed. R. Evid. 402, 403. See Strick's motion in limine re inapplicable standards. (DOC 629.)

Respectfully submitted, DAWSON & CLARK, P.C.

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## ATTORNEYS FOR DEFENDANT STRICK

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 13, 2014, a true and correct copy of the above and foregoing was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure.

\_\_\_\_/s/\_*Donald H. Dawson, Jr.* DONALD H. DAWSON, JR.